

THE TWO HUNDRED EIGHTY-NINTH OMNIBUS OBJECTION TO CLAIMS SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OBJECTION AND/OR THE EXHIBITS ATTACHED THERETO TO DETERMINE WHETHER THE OBJECTION AFFECTS THEIR CLAIM(S).

**IF YOU HAVE QUESTIONS, PLEASE CONTACT
LEHMAN BROTHERS HOLDINGS INC.'S
COUNSEL, ERIKA DEL NIDO, AT 212-310-8323.**

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Robert J. Lemons

Attorneys for Lehman Brothers Holdings Inc.
and Certain of its Affiliates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**NOTICE OF HEARING ON
TWO HUNDRED EIGHTY-NINTH OMNIBUS
OBJECTION TO CLAIMS (PARTNERSHIP INTEREST CLAIMS)**

PLEASE TAKE NOTICE that on April 17, 2012, Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the "Plan") for certain entities in the above-referenced chapter 11 cases (the "Chapter 11 Estates"), filed the two hundred eighty-ninth omnibus objection to claims (the "Two Hundred Eighty-Ninth Objection to Claims"), and

that a hearing (the "Hearing") to consider the Two Hundred Eighty-Ninth Omnibus Objection to Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **May 31, 2012 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses to the Two Hundred Eighty-Ninth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-399, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for LBHI and certain of its affiliates, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Robert J. Lemons, Esq. and Garrett Fail, Esq.); and (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq., and Andrea B. Schwartz, Esq.); so as to be so filed and received by no later than **May 17, 2012 at 4:00 p.m. (Eastern Time)** (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Two Hundred Eighty-Ninth Omnibus Objection to Claims or any

claim set forth thereon, LBHI may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Two Hundred Eighty-Ninth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: April 17, 2012
New York, New York

/s/ Robert J. Lemons
Robert J. Lemons

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767 Fifth Avenue
New York, New York 10153
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**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
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LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**TWO HUNDRED EIGHTY-NINTH
OMNIBUS OBJECTION TO CLAIMS (PARTNERSHIP INTEREST CLAIMS)**

THE TWO HUNDRED EIGHTY-NINTH OMNIBUS OBJECTION TO CLAIMS SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OBJECTION AND/OR THE EXHIBITS ATTACHED THERETO TO DETERMINE WHETHER THE OBJECTION AFFECTS THEIR CLAIM(S).

**IF YOU HAVE QUESTIONS, PLEASE CONTACT
 LEHMAN BROTHERS HOLDINGS INC.'S
 COUNSEL, ERIKA DEL NIDO, AT 212-310-8323.**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”) for the entities in the above-referenced chapter 11 cases (the “Chapter 11 Estates”), respectfully represents as follows:

Relief Requested

1. The Plan Administrator files this omnibus objection to claims (the “Two Hundred Eighty-Ninth Omnibus Objection to Claims”) pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the “Procedures Order”), seeking to disallow and expunge certain claims for which LBHI has no liability.

2. The Plan Administrator seeks to disallow and expunge each proof of claim listed on Exhibit A annexed hereto (collectively, the “Partnership Claims”) filed against LBHI. The Partnership Claims assert and are based solely on either an ownership interest in one or more partnership funds or losses associated with such interest. LBHI has no liability for the claimants’ interests in the partnerships and no liability for the Partnership Claims. The partnerships identified in the Partnership Claims are separate corporate entities from LBHI and are not debtors in the above-captioned cases.

Jurisdiction

3. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Background

4. Commencing on September 15, 2008, and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under title 11 of the Bankruptcy Code. These chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b).

5. On January 14, 2010, the Court entered the Procedures Order, which authorizes the filing of omnibus objections to no more than 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order, including “the Claims seek recovery of amounts for which the Debtors are not liable.” *See* Procedures Order at 2.

6. On December 6, 2011, the Court approved and entered an order confirming the Plan. The Plan became effective on March 6, 2012.

7. Pursuant to the Plan, the Plan Administrator is authorized to impose and prosecute objections to claims filed against the Chapter 11 Estates.

The No Liability Claims Should Be Disallowed and Expunged

8. Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). A proof of claim is “deemed allowed, unless a party in interest objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida, Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at *15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).

9. In its review of the claims filed on the claims register in these chapter 11 cases, the Plan Administrator has identified the Partnership Claims as asserting a claim for an interest in one or more of the following funds (or their related feeder funds): Lehman Brothers MLP Opportunity Capital Partners, L.P.; Lehman Brothers MLP Opportunity Delaware Fund, L.P.; Lehman Brothers Partnership Account 2000/2001, L.P.; LibertyView Credit Opportunities Fund, L.P.; LibertyView Credit Select Fund, L.P.; and LibertyView Special Opportunities Fund, L.P. (collectively, the “Funds”). The Funds are not debtors in the above-captioned cases. Furthermore, neither LBHI nor any of the debtors in the above-captioned cases are general partners of the Funds. The Partnership Claims do not indicate any ground for liability by LBHI or any of the debtors in the above-captioned cases. An interest in a non-debtor partnership fund does not result in a claim against, nor a right to payment from, LBHI or any of the debtors.

10. Unless the Partnership Claims are disallowed and expunged, parties who do not hold valid claims against LBHI’s estate may nonetheless recover from LBHI. LBHI respectfully requests that the Court enter an order disallowing and expunging in their entirety the Partnership Claims.

Reservation of Rights

11. LBHI reserves all rights to object on any basis to any No Liability Claim as to which the relief requested herein is not granted.

Notice

12. No trustee has been appointed in these chapter 11 cases. Notice of this Two Hundred Eighty-Ninth Omnibus Objection to Claims has been provided to (i) the U.S. Trustee; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) each claimant listed on Exhibit A; and (vi) all other parties entitled to notice in accordance with the procedures set forth

in the second amended order entered on June 17, 2010, governing case management and administrative procedures for these cases [Docket No. 9635]. The Plan Administrator submits that no other or further notice need be provided.

13. No previous request for the relief sought herein has been made by the Plan Administrator or the Debtors to this or any other Court.

WHEREFORE the Plan Administrator respectfully requests entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: April 17, 2012
New York, New York

/s/ Robert J. Lemons

Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
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Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**ORDER GRANTING THE
TWO HUNDRED EIGHTY-NINTH OMNIBUS
OBJECTION TO CLAIMS (PARTNERSHIP INTEREST CLAIMS)**

Upon the two hundred eighty-ninth omnibus objection to claims, dated April 17, 2012 (the “Two Hundred Eighty-Ninth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking disallowance and expungement of the No Liability Claims on the basis that LBHI has no liability for such claims, all as more fully described in the Two Hundred Eighty-Ninth Omnibus Objection to Claims; and due and proper notice of the Two Hundred Eighty-Ninth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief requested in the Two Hundred Eighty-Ninth Omnibus Objection to Claims is in the best interests of LBHI, its estate, creditors, and all parties in interest and that the legal and factual bases set forth in the Two

¹ Terms not defined herein shall have the same meaning ascribed to them in the Two Hundred Eighty-Ninth Omnibus Objection to Claims.

Hundred Eighty-Ninth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Two Hundred Eighty-Ninth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that the Court-appointed claims agent is authorized to modify the claims register to reflect this order; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Two Hundred Eighty-Ninth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT A

IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 289: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
1	ARTICLE 7TH TRUST U/W/O SHERMAN R. LEWIS, JR. DOROTHY LEWIS, TRUSTEE 47 EAST 88TH ST. APT. 15C NEW YORK, NY 10128	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19087	\$37,340.00
2	CARSON, DOUGLAS F. 907 FEARRINGTON POST PITTSBORO, NC 27312	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/08/2009	10810	\$70,000.00
3	DAVID L. MCDONALD LIVING TRUST 14141 MILLERTON ROAD PRATHER, CA 93651-9798	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/27/2009	9539	\$3,000,000.00
4	FRADIN, RUSSELL P & JUDITH B TEN IN COM 400 E 84TH ST APT 27B NEW YORK, NY 10028-5612	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/29/2009	2146	\$1,000,000.00
5	FRESNO REGIONAL FOUNDATION 5250 N PALM AVENUE SUITE 424 FRESNO, CA 93704-2214	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/30/2009	6672	\$700,000.00
6	GENIRS, KEVIN R. 411 WEST END AVE APARTMENT 7A NEW YORK, NY 10024	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28478	\$28,005.00
7	HALEY, ROY W. & EDYTHE F. JTWROS 5198 VARDON DR WINDERMERE, FL 34786-8960	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14774	\$1,000,000.00
8	HAYAT, CLAUDE 110 EAST 57TH STREET APARTMENT 10E NEW YORK, NY 10022-2618	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	21343	\$49,138.00

IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 289: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
9	IRA CINI L.P. COLLEEN E. MCMANUS MIUCH SHELIST DENENBERG AMENT & RUBENSTEIN, P.C. 191 N. WACKER DRIVE, SUITE 1800 CHICAGO, IL 60606	08-13555 (JMP)	Lehman Brothers Holdings Inc.	05/20/2009	4456 ¹	\$3,426,012.55
10	LIEBERBERG, ROBERT 120 EAST END AVE. APT 4B NEW YORK, NY 10028	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/16/2009	13412	\$48,500.00
11	MAIDMAN, DAGNY 770 RHODE ISLAND STREET SAN FRANCISCO, CA 94107-2630	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/30/2009	6668	\$50,000.00
12	MARINO, THOMAS 91 CENTRAL PARK WEST APT 14A NEW YORK, NY 10023	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	15172	\$178,576.87
13	MAYROCK, ISIDORE 395 DUCK POND ROAD LOCUST VALLEY, NY 11560	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/30/2009	2302	\$1,500,000.00
14	MAYROCK, ISIDORE 395 DUCK POND ROAD LOCUST VALLEY, NY 11560	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/30/2009	2303	\$1,000,000.00
15	MIKULICH, RAYMOND C. 15 CENTRAL PARK WEST, APT 15D NEW YORK, NY 10023	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23845	\$1,000,000.00

¹ Claim 4456 is being expunged solely with respect to its asserted claim of \$1,704,662.55, related to LibertyView Credit Opportunities Fund II, LLC. The remaining portion of Claim 4456 was previously expunged pursuant to the Order Granting the Debtors' Twentieth Omnibus Objection to Claims (Duplicative of Indenture Trustee Claims), dated Sept. 21, 2010, ECF No. 11501 (the "Duplicative Claim Order"). The dollar amount of the previously expunged portion of Claim 4456 identified in the Duplicative Claim Order was incorrect; however, upon entry of this Order, Claim 4456 shall be disallowed and expunged in its entirety.

IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 289: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
16	PEREIRA,BRIAN 22 MEADOW ROAD SCARSDALE, NY 10583	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	31133	\$200,000.00
17	RIVERSIDE ASSET MANAGEMENT, LLC C/O JAMES J. CHESTER 65 EAST STATE STREET, SUITE 1000 COLUMBUS, OH 43215	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/26/2009	1990	\$600,000.00
18	ROSEN, LEONARD G. 64 PINKAS STREET APARTMENT 153 TEL AVIV, 62157 ISRAEL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	33637	\$36,375.00
19	SAHN, BOBBY 1 CENTRAL PARK SOUTH APARTMENT 806 NEW YORK, NY 10019	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28312 ²	\$1,000,000.00
20	SPIEGEL, WILLIAM & KADIN, LISA 2109 BROADWAY, APT. 16-144 NEW YORK, NY 10023	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/30/2009	2295	\$500,000.00
21	SPIEGEL, WILLIAM & KADIN, LISA 2109 BROADWAY, APT. 16-144 NEW YORK, NY 10023	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/30/2009	2297	\$500,000.00
22	SUMMIT CAPITAL PARTNERS LP C/O CHESTER B. SALOMON, ESQ. BECKER, GLYNN, MELAMED & MUFFLY LLP 299 PARK AVENUE NEW YORK, NY 10171	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	22074	\$1,200,000.00

² The portion of Claim No. 28312 relating to cusip 52520W143 in the amount of \$221,783.85 remains unaffected by this Order.

IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 289: EXHIBIT A - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
23	SURYAN FAMILY TRUST C/O FRANK SURYAN JR. 3821 SEASCAPE DRIVE HUNTINGTON BEACH, CA 92649-2523	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19330	\$625,766.72
24	TASHLIK, THEODORE WM IRA CUSTODIAN 9 OVERLOOK CIR MANHASSET, NY 11030-3933	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/15/2009	40345 ³	\$1,000,000.00
25	UBELHART, KAREN A 800 WEST END AVE APT 7A NEW YORK, NY 10025-5467		Lehman No Case Asserted/All Cases Asserted	09/22/2009	30621 ⁴	\$53,573.00
26	WOLT, ETHAN M. 155 WEST 68TH STREET APARTMENT 24B NEW YORK, NY 10023	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30461	\$250,000.00
					TOTAL	\$19,053,287.14

³ The portion of Claim No. 40345 relating to cusip 52517P7H8 in the amount of \$100,000 was previously expunged pursuant to the Order Granting the Debtors' One Hundred Forty-Eighth Omnibus Objection to Claims (Duplicative of Indenture Trustee Claims), dated July 21, 2011, ECF No. 18712.

⁴ Claim 30621 is being expunged solely with respect to its asserted claim of \$53,573.00, related to MLP Opportunity Capital Partners, L.P. A remaining portion of Claim 30621, in the amount of \$9,654.00, was previously reclassified as an equity interest pursuant to the Order Granting the Debtors' One Hundred Forty-Ninth Omnibus Objection to Claims (To Reclassify Proofs of Claim as Equity Interests), dated Sept. 21, 2011, ECF No. 18708.